EXHIBIT 1

N. 1

OPM, "Records Management," https://www.opm.gov/information-management/records-management/ (last accessed Feb. 10, 2025).

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OPM.gov / Information Management / Records Management

RECORDS MANAGEMENT OVERVIEW

The Office of Personnel Management (OPM) is responsible for a wide array of records that are created, received, and used by the agency for the conduct of official business. These include office (or administrative) records, as well as employment-related records of many kinds, from hiring to benefits to retirement.

At OPM, Records Management, based in the Office of the Chief Information Officer, holds primary responsibility for:

- Developing policies, procedures, and guidance regarding both OPM's internal administrative records;
- Consulting with information technology (IT) experts throughout OPM to ensure that good recordkeeping processes are an integral part of the agency's IT projects and plans;
- Coordinating OPM's records activities within the agency's and with other agencies, particularly the National Archives and Records Administration (NARA); and
- Providing information to the public and oversight authorities regarding OPM's records management activities.

On this website, you will find information about our records-related policies and records schedules, along with references to the more general guidance provided by NARA; information on records management laws and statutes, including a table describing what we are doing to meet Federal records management requirements; and contact information.

POLICIES

All Federal records must be *scheduled*: they must be assigned an appropriate amount of time after which they will be destroyed or transferred to the National Archives for permanent retention. After records are no longer needed for frequent consultation, but before they are ready to be destroyed or transferred to the National Archives, agencies frequently use the services of NARA's Federal Records Centers (FRCs), where the records are stored but can be retrieved whenever the responsible agency needs them to conduct its business. This is what OPM does with OPFs. NARA issues General Records Schedules (GRS), which we use to schedule many of our records; where no GRS meets OPM's needs, the agency uses one of the following agency-specific, NARA-approved schedules:

- Administrative Management (ADM)

- Administrative Services (ADS)
- Appeals (APP)
- Budget and Finance (BUF)
- Classification and Compensation (CLC)
- Committee Management (COM)
- Employee Development and Utilization (EDU)
- Employment (EMP)
- Electronic Office Records (EOR)
- Employee Relations and Services (ERS)
- Evaluation (EVL)
- Executive Personnel (EXP)
- Examining and Recruiting (EXR)
- Information Services (INF)
- Insurance (INS)
- Investigations (INV)
- Intergovernmental Personnel Programs (IPP)
- Legal (LEG)
- Medical (MED)
- Office of Inspector General Records (OIG)
- Personnel - OPM (PER)
- Retirement (RET)

COMPLIANCE

Laws & Statutes

The primary laws regarding records management are 44 U.S.C. 31 (the Federal Records Act) and 44 U.S.C. 33, Disposal of Records, but these are only two parts of a wider universe of pertinent laws, regulations, and guidance. We are actively working to maintain, improve, or achieve compliance with each pertinent records management requirement.

Records Management is reviewing records management practices throughout the agency. We are:

- Completing completing an internal, agency-wide records inventory to identity all records, paper and electronic, both those that have been assigned an appropriate amount of time after which they will be destroyed or given to the National Archives and Records Administration (i.e., those that have been *scheduled*) and those that are as yet unscheduled. With this inventory in hand, we will create an effective file plan and records maintenance and disposition procedures for the agency to follow regarding all Federal records;

- Developing a vital records program to identify and protect those records that specify how OPM will operate in case of emergency or disaster, those records vital to the continued operations of the Agency during and after an emergency or disaster, and those records needed to protect the legal and financial rights of the Government and of the persons affected by its actions;
- Creating, a workable system for retaining records and storing inactive records in accordance with our internal policies and legal requirements at all organizational levels within OPM;
- Developing a systematic method for disposition and destruction of outdated records in accordance with the OPM and National Archives and Records Administration (NARA) retention and disposition schedules;
- Establishing guidelines for selecting and identifying archival records, that is, those that should be maintained permanently;
- Providing training to all OPM personnel, both at Headquarters and in field offices, in records management procedures and responsibilities;
- Providing guidance to all OPM personnel for the periodic disposition of records that are not in use (*inactive records*) and non-records in the office work areas;
- Planning a communications forum for disseminating records management information to all OPM personnel on records management issues and policies; and
- Establishing a program for the periodic evaluation of all aspects of our records management program.

We are working to identify all of the ways in which OPM is and is not responding to records management requirements at all of our locations, our current records management system consists of a decentralized set of processes, procedures, and practices, making this a lengthy process. The following table reflects our research to date:

Compliance with Records Management Requirements

Citation	Requirement	Compliant?	Notes
44 U.S.C. 3101	Management Support of RM Program	Yes	Renewed commitment in 2009
36 C.F.R. Chapt. 12	Staffing	In process	Reviewing schedules as part of RM Handbook update
44 U.S.C. 3302 44 U.S.C. 3302	Records Inventory	Under review	To be completed in fiscal year 2010
44 U.S.C. 3302 44 U.S.C. 3302	Records Schedules	Under review	Reviewing schedules as part of RM Handbook update
36 C.F.R. 1222	Maintenance	Unknown	Status and condition of records is being addressed as part of the Records Inventory
44 U.S.C. 3303	Disposition	No	Identifying records that have passed their retention during Records Inventory

CONTACTS

Requests for OPM Records

If you are seeking access to OPM records, please visit our Open Government Portal and Freedom of Information Act (FOIA) websites to find online records. The FOIA site will also help you make a request for records that cannot be found on OPM's website. Generally, you make a Privacy Act request for records about yourself and a FOIA request for other records; you will find guidance about both kinds of requests on the FOIA site.

Background Investigations

For information on how to obtain a copy of your background investigation conducted by OPM's Federal Investigative Services, please visit our FOIA contacts page.

Other Ways to Connect